

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
HISCOX INSURANCE COMPANY, INC.

18-CV-102222-PAE

Plaintiff,

**AFFIRMATION IN  
SUPPORT OF REQUEST  
FOR CERTIFICATE OF  
DEFAULT**

-against-

CURTIS BORDENAVE, BUSINESS MOVES  
CONSULTING, INC. dba BUSINESS MOVES, KHALED  
M. KHALED and ATK ENTERTAINMENT, INC.

Defendants.  
-----X

Laura B. Dowgin, Esq., hereby declares as follows:

1. I am counsel for the Plaintiff in this action.
2. This action was commenced pursuant to 28 U.S.C. §2201 seeking a declaration that Plaintiff Hiscox Insurance Company, Inc. does not owe a defense or indemnification for an underlying trademark infringement lawsuit pending against Defendant Business Moves Consulting, Inc. dba Business Moves and others.
3. The time for Defendant Business Moves Consulting Inc. dba Business Moves to answer or otherwise move with respect to the complaint herein has expired. See Memo Endorsement, Doc. #10 dated December 4, 2018.
4. Defendant Business Moves Consulting Inc. dba Business Moves has not answered or otherwise moved with respect to the complaint, and the time for Defendant Business Moves

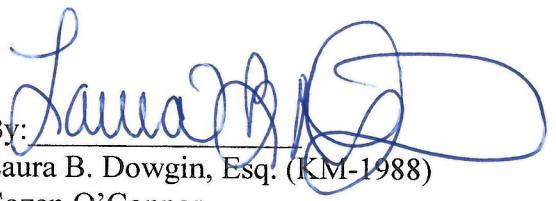
Consulting Inc. dba Business Moves to answer or otherwise move has not been extended past December 31, 2018.

5. Defendant Business Moves Consulting Inc. dba Business Moves is not an infant or incompetent. Defendant Business Moves Consulting Inc. dba Business Moves is not presently in the military service of the United States as appears from the facts of this litigation.

**WHEREFORE**, Plaintiff Hiscox Insurance Company, Inc. requests that the default of Defendant Business Moves Consulting Inc. dba Business Moves be noted and a certificate of default issued. Pursuant to Local Rule 55.2(b), following issuance of a certificate of default, Plaintiff Hiscox Insurance Company, Inc. will apply to the Court as described in Fed. R. Civ. P. 55(b)(2).

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief.

Dated: New York, New York  
January 2, 2019

By:   
Laura B. Dowgin, Esq. (KM-1988)  
Cozen O'Connor  
Attorneys for Plaintiff  
45 Broadway, Suite 1600  
New York, New York 10006  
(212) 453-3775  
ldowgin@cozen.com